

## Circuit Court of Maryland for Baltimore County

County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Case No: 03-C-12-011769 V1

Date: 11/20/12

Candace D Williams  
(Confidential Address)

vs

District Court#:

Terrell Suggs

Page: 01

Baltimore, MD 21244

(4):

(W):

## TEMPORARY PROTECTIVE ORDER

## PETITIONER/PLAINTIFF

Name (First/Middle/Last): CANDACE D WILLIAMS

Date of Birth: 07/09/1982

and any minor(s) or minor child(ren) on whose behalf the  
petition was filed (List names and date(s) of birth.)

OTHER(S) TO BE PROTECTED

CANDACE D WILLIAMS

07/09/1982

VS.

## RESPONDENT/DEFENDANT

TERRELL SUGGS

Relationship to Petitioner

☐ Spouse ☐ Former Spouse ☐ Vulnerable adult☒ Cohabitant ☒ Children in Common ☐ Parent☐ Other Relationship

8400 Summit Avenue, Baltimore, MD 21244 Phone:

CAUTION: ☐ Weapon Involved

Type:

☒ Access to Firearms(s)

## RESPONDENT IDENTIFIERS

SEX	RACE	DOB	HT	WT
M	African American	10/11/1952	164	205
EYES	HAIR	Distinguishing Features		
Brown	Brown			
DRIVER'S LICENSE#		STATE	EXPIRES	
VEHICLE DESCRIPTION			TAG NO.	
EMPLOYER Baltimore Ravens				

THE COURT FINDS that under the laws of Maryland the issuing Court has jurisdiction over the parties and the subject matter.

THE COURT ORDERS:

That the above named Respondent SHALL NOT abuse, threaten to abuse, and/or harass the Protected Party(ies).

☒ That the above named Respondent SHALL NOT contact Protected Party(ies) by any means, except as stated in this Order.

Additional terms of the Order are as set forth in this document.

The terms of this Order shall be effective until 11/27/2012.

Only the Court can change this Order.

## NOTICE TO RESPONDENT: PENALTIES

Violation of this Order may result in criminal prosecution, imprisonment and/or fine, and contempt of court. Law enforcement shall arrest a person who the officer has probable cause to believe is in violation of this Order, as required by Maryland Code, Family Law Article, § 4-508 and Criminal Procedure § 2-204.1. This Protective Order shall be recognized and enforced by the courts of any state, the District of Columbia, any U.S. Territory, tribal lands (18 U.S.C. § 2255) or Department of Defense installations. (10 U.S.C. § 1561e) Crossing state, territorial or tribal boundaries to violate this Order may result in federal imprisonment. (18 U.S.C. § 2252)

Federal law provides penalties of up to \$250,000 fine and 10 years in prison for possessing, transporting, shipping, or receiving any firearm or ammunition while subject to a protective order or after being convicted of a misdemeanor crime of domestic violence (18 U.S.C. § 922(g)(8)) or knowingly transferring a firearm after a conviction of a misdemeanor crime of domestic violence (18 U.S.C. § 922(g)(9)). Questions regarding this notice should be directed to your attorney, law enforcement agency, or the Maryland State Police Firearms Enforcement Section at 410-290-0050.

EXHIBIT

1

## Circuit Court of Maryland for Baltimore County

County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Case No: 03-C-12-011769 v1 Date: 11/20/12

District Court#:

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Candace D Williams

vs

Terrell Suggs

After the appearance of Petitioner, Petitioner's Counsel and in consideration of the Petition and evidence, the Court makes the following findings:

1. Original Request
  - A. That Candace D Williams, John Rae Suggs F, Duke Lamarious Suggs M, who are Persons Eligible for Relief, are:
    - A cohabitant with the Respondent.
    - An individual who has a child(ren) in common with the Respondent. John Rae Suggs F (5)DOB: 09/21/2007 and Duke Lamarious Suggs M (3)DOB: 12/04/2008.
  - B. That the Petitioner is:
    - A Person Eligible for Relief.
  - C. That there are reasonable grounds to believe that Respondent committed the following abuse(s):
    - Caused serious bodily harm
    - Assault in any degree
    - On 11/15/2012 at 12:45 am. Assaulted the Petitioner.
    - That the Respondent has access to firearm(s).
  - D. That, in the case of a request for an order to vacate the home, the Respondent and the Person(s) Eligible for Relief resided together at the time of the abuse and:
    - Are not married, but a Person Eligible for Relief has resided in the home with the Respondent for at least 90 days within the past year.

Based on the foregoing findings, the Court hereby ORDERS:

1. That the Respondent SHALL NOT abuse, threaten to abuse, and/or harass: Candace D Williams.
2. That the Respondent SHALL NOT contact (in person, by telephone, in writing, or by any other means) or attempt to contact: Candace D Williams.
3. That the Respondent SHALL NOT enter the residence of Candace D Williams and/or at (Confidential address) / (Residence includes yard, grounds, outbuildings, and common areas surrounding the dwelling).
4. That the Respondent SHALL STAY AWAY from:
  - School: Magic Moments Daycare- Cronhill Drive, Owings Mills Md.
5. That the Respondent SHALL VACATE the home immediately (home includes yard, grounds, outbuildings, and common areas surrounding the dwelling) at [REDACTED] and remain away until the hearing provided for below. (Paragraph 7 and hearing date set on extension of order.) Temporary use and possession of the home is granted to Candace D Williams. The Respondent, accompanied by a law enforcement officer, may return to collect clothing and personal necessities, only between the hours of [REDACTED] and [REDACTED] or as directed by local law enforcement.

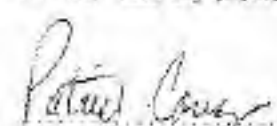
## Circuit Court of Maryland for Baltimore County

County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Case No: 03-C-12-011763 VI Date: 11/20/12  
 District Court#  
 Candace D Williams Vs Terrell Suggs Page: 03

As directed by local law enforcement.

6. That custody of: John Lee Suggs F, Duke Lamontous Suggs M is awarded to Candace D Williams until the hearing provided for in Paragraph 8 below.
7. That the Respondent SHALL immediately surrender all firearm(s) to law enforcement agency: Baltimore County Sheriff-AK-47, Shotgun-Total seven guns, and to refrain from possession of any firearms, for the duration of this Protective Order
8. THAT A FINAL PROTECTIVE ORDER HEARING SHALL BE HELD ON November 27, 2012, AT 09:30 am At County Courts Building 401 Bosley Avenue Towson MD 21285-6754.  
 NOTICE TO ALL PARTIES: Please bring all photos, documents and other evidence that you may have with you to court on your hearing date.
9. Additional Provisions  
 Exclusive use and possession of 2008 Hummer is granted to Candace Williams. Terrell Suggs shall pay emergency family maintenance in the amount of \$40,000.00 per month to Candace Williams beginning Nov. 20, 2012 -payment to be made at 610 Bosley Ave, Towson Md. 2124-The law office of Charles E. Brooks Esq.
10. This order supersedes and overrides any previously entered Interim Protective Order issued by a Commissioner.

11/20/2012 04:15 pm

  
 Judge Hon. Patrick J. Kavanaugh

## NOTICE TO RESPONDENT

A Petition for Protection alleges that you have committed abuse. On the basis of the Petition this Temporary Protective Order has been issued. Violation of this Order may be a state and/or federal crime or contempt of court, or both, and result in imprisonment or fine or both. This Order may be enforced by another state or jurisdiction, which may impose additional or different penalties for the violation.

In order to respond to the allegation that abuse occurred, you must appear in court at the Final Protective Order hearing provided for in this Order. If at the hearing the court finds by clear and convincing evidence that abuse occurred, the court will issue a Final Protective Order against you, whether you appear or fail to appear, and may order all or part of the relief requested by the Petitioner or granted in this Order. This relief may include temporary use and possession of your home, use and possession of jointly owned vehicles, Emergency Family Maintenance, child visitation, surrender of firearms(s) to a law enforcement agency, and counseling or participation in a domestic violence program. A Final Protective Order may be in effect: (a) for as long as one (1) year, and the court for good cause may extend the term for the Final Protective Order for an additional six (6) months after a further hearing; or (b) a Final Protective Order may be extended for a period not to exceed two (2) years, if a judge finds the respondent has committed a subsequent act of abuse against the petitioner or a protected person; or (c) a Final Protective Order may last for as long as two (2) years, if there is a finding that this is a subsequent act of abuse committed within one (1) year after the date that a prior Final Protective Order issued against the same Respondent on behalf of the same person eligible for relief expires, and the prior Final Protective Order was issued for a period of at least six (6) months.



## Circuit Court of Maryland for Baltimore County

County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Case No: 03-CV-12-011769 V1 Date: 11/20/12

Candace D Williams

Vs

District Court:

Tarnell Suggs

Page: 04

If you fail to appear in court and a Final Protective Order is issued against you, you will be served by first-class mail at your last known address with the Final Protective Order and all other notices concerning the Protective Order. The Final Protective Order will be valid and enforceable upon mailing. It is your responsibility to notify the court in writing of any change of address.

State law requires the Respondent to surrender all firearms to a law enforcement agency if a Final Protective Order is issued.

## NOTICE TO ALL PARTIES

Each party may be represented by an attorney. At the Final Protective Order hearing, the petitioner will be required to prove the alleged facts by clear and convincing evidence. This is difficult to do if you do not have legal training. Each party should see a lawyer. If you are the petitioner and cannot get a private lawyer, there are support agencies that may be able to help you.

Although each party is not required to have a lawyer at the hearing, all of the Rules of Evidence will apply to the case. If you choose not to have a lawyer with you on the hearing date, the Petitioner will still have to prove the case by "clear and convincing evidence" and each party will have to comply with the Rules of Evidence. Due to the emergency nature of this hearing, the hearing may be held even if a party requests more time to obtain an attorney.

At the Final Protective Order hearing, the court may order the Respondent to pay Emergency Family Maintenance and may pass an immediate and continuing withholding order for that purpose. If Emergency Family Maintenance is requested, both parties should complete a Financial Statement (CC-DCAPV 4) before the Protective Order hearing and bring it to court. You should also bring documents (such as pay stubs, copy of your lease, bills, etc.) to support the figures you supply.

If the court is closed on the day this Temporary Order expires, the Order remains in effect until the second day the court is open. The Final Protective Order Hearing will be held by that time. You should contact the Clerk's Office at: Maryland (toll) Free Number (800) 938-5802 to verify your hearing date and time.

TRUE COPY CERTIFICATION OF TEMPORARY PROTECTIVE ORDER  
Attestation of Clerk

I, Julie L. Enson, Clerk of this Court in Baltimore County, State of Maryland, do hereby certify that I have compared this Order with the original Order, which is on file in my office, and that this Order is a true and correct copy of the original, and the whole thereof.

In testimony whereof, I have hereunto set my hand and affixed the seal of the said court at County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Maryland, this 20th day of November, 2012.

Julie L. Enson



Julie L. Enson



**Circuit Court of Maryland for Baltimore County**

County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754 Case No: 03-C-12-C-1759 V1 Date: 11/20/12

District Court#:

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Candace D Williams

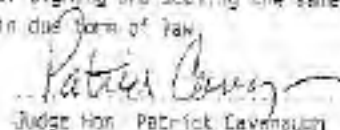
vs

Terrell Suggs

**Attestation of Judge**

I, Judge Hon. Patrick Cavanaugh, Judge of this Court in Baltimore County, State of Maryland, do hereby certify that Julie L. Enson whose name is subscribed to the foregoing certificate of attestation, now is, and/or was at the time of signing and sealing the same, a Clerk of this Court in Baltimore County and that his/her attestation is in due form of law.

11/20/2012



Judge Hon. Patrick Cavanaugh

Court: Circuit Court of Maryland for Baltimore County

Address: County Courts Building 401 Bosley Avenue, Towson, MD 21285-6754

Phone: (410) 516-6070 Fax:

To request a foreign language interpreter or a reasonable accommodation under the Americans with Disabilities Act, please contact the court immediately. Possession and use of cell phones and other electronic devices may be limited or prohibited in designated areas of the court facility.

Judge Time
Hours Minutes

MARYLAND  
JUDICIARY

☒ CIRCUIT COURT ☐ DISTRICT COURT OF MARYLAND FOR Baltimore County

Located at 401 Bosley Avenue, Towson, MD 21204

Case No. 03-C-12-11769

(NOTE: Fill in the following, checking the appropriate boxes. Petitioners need not give an address if doing so risks further abuse or reveals the confidential address of a shelter. If this is the case, check here ☐ If you need additional paper, ask the clerk.)

CANDACE D. WILLIAMS

Petitioner

Street Address, Apt. No.

Windsor Mill, MD 21244

City, State, Zip Code

Work:

Work:

Telephone Number(s)

vs.

TERRELL SUGGS

Respondent

Street Address, Apt. No.

Windsor Mill, MD 21244

City, State, Zip Code

Home:

Work:

Telephone Number(s)

### PETITION FOR PROTECTION FROM

☒ DOMESTIC VIOLENCE ☐ CHILD ABUSE ☐ VULNERABLE ADULT ABUSE

1. I want relief for ☒ myself ☐ minor child ☐ vulnerable adult, from abuse by Terrell Suggs

The Respondent committed the following acts of abuse against Candace D. Williams

on or about: early September, 2012 (check all that apply.) ☐ kicking ☒ punching ☐ choking/strangling  
☐ slapping ☐ shooting ☐ rape or other sexual offense (or attempt) ☐ hitting with object ☐ stabbing  
☒ shoving ☐ threats of violence ☒ mental injury of a child ☐ detaining against will ☐ stalking ☐ biting  
☒ other Dragged me with the vehicle he was driving

The details of what happened are: (Describe injuries, State when and where these acts occurred. Be as specific as you can.) I drove with my children to a house off of Old Court Road and saw Terrell inside. He told me he was going to be somewhere else so I knocked on the door. He opened the door and wrestled me outside. I hit him and got in my car to leave. He opened the driver's door and jumped into the car over me. He began punching my neck and threw me out of the car. I tried to grab my purse and phone from the car but he started to drive away with our children in the car. My hand was stuck in the seat belt and he dragged me at a high rate of speed. I finally freed myself and fell in the road. He came back and picked me up and drove home. I suffered severe road rash on my legs and feet and was treated at Urgent Care. I could not walk and friends stayed with me for two weeks to help with personal needs and care. Last Thursday I left home with our children and I am afraid that he will come after me and beat me and take the children.

2. (If the victim is a child or vulnerable adult, fill in the following): I am asking for protection for a ☐ child ☐ vulnerable adult whose name is

At this time the victim can be found at

I am ☐ State's Attorney ☐ DSS ☐ a relative ☐ an adult living in the home.

3. The person(s) I want protected are (include yourself if you are a victim):

Names(s)  
Candace D. Williams

Birthdate  
07/09/1983

Relationship to Respondent

Self

Daughter

Son



CANDACE D. WILLIAMS

Petitioner

Case No.

vs.

TERRELL SUGGS

Respondent

4. the person(s) I want protected now lives, or has lived, with the Respondent for the following period of time during the past year: 11 1/2 months

There ☒ are ☐ are not additional persons living in the home.

5. I know of the following court cases involving me, or the person I want protected, and the Respondent. (Examples include: paternity, child support, divorce, custody, domestic violence, juvenile cases, criminal cases)

Court	Kind of Case	Year Filed	Result or Status (if you know)
Baltimore City District	Protective Order	2009	Rescinded
Baltimore County	Custody	2009	Dismissed
Baltimore County	Tort	2009	Dismissed

6. ☐ I have received a final protective order against the same respondent that expired within one (1) year of the abuse alleged in this petition, and which was issued for a period of at least six (6) months.

☐ Date issued

☐ Date expired

☐ Location where issued

7. Describe all past injuries the Respondent has caused the victim, and give date, if known 12/2009-Held me down on the floor and pured bleach on me and our son. 09 or 10/2009- Held me down on the floor and kicked my face and broke my nose. Throughout our relationship, since early 2007, he has punched me in the face and stomach and threatened to take the children from me if I left him. He stole my ID so I could not leave.

8. The Respondent owns or has access to the following firearms: At least 7: Shotgun, handguns, rifles.

9. I want the court to order the Respondent: (NOTE: Petitioner need not give an address if doing so risks further abuse)

☒ NOT to abuse or threaten to abuse Candace D. Williams, I

Name(s)

☒ NOT to contact, attempt to contact, harass Candace D. Williams, Suggs

Name(s)

☒ NOT to go to the residence(s) at Windsor Mill, MD 21244

Address

☐ NOT to go to the school(s) at

Name of school and address

☒ NOT to go to the child care provider(s)

Name of child care provider and address

☐ NOT to go to the work place(s) at

Name(s)

Case No. \_\_\_\_\_  
**CANDACE D. WILLIAMS** vs. **TERRELL SUGGS**  
 Petitioner Respondent

☒ To leave the home at [REDACTED], Windsor Mill, MD 21244  
 and give possession of the home to Candace D. Williams

The name(s) on the deed or lease are Terrell Suggs and Laverne Kennedy Suggs

☒ To turn over firearm(s) to a law enforcement agency.

☐ To go to counseling ☐ domestic violence ☐ drug/alcohol ☐ other

☒ To pay money as Emergency Family Maintenance (may be taken from Respondent's paycheck).

10. I also want the Court to order:

☒ Custody of [REDACTED]  
 be granted to Candace D. Williams

☒ Use and possession of the following jointly-owned vehicle be granted to Candace D. Williams  
2008 Hummer White H2

☐ Temporary possession of the pet(s) \_\_\_\_\_  
 be granted to \_\_\_\_\_

11. (Fill in only if you are seeking Emergency Family Maintenance.) The Respondent has the following financial resources:

Income from employment in the amount of \$ \$100,000.00-\$200,000.00 every ☒ week ☐ 2 weeks ☐ month  
☐ other \_\_\_\_\_

Source of employment income Baltimore Ravens

Income from other source Endorsements

The Respondent also owns the following property of value: Automobile(s) \$ 500,000.00

Home \$ 850,000.00

Bank Account(s) \$ Millions

Other: \_\_\_\_\_

I solemnly affirm under the penalties of perjury that the contents of the foregoing Petition are true to the best of my knowledge, information and belief.

11-20-12

Date

☒ I have filled in the Addendum (Description of Respondent), CC-DC/DV 1A

#### NOTE

If you believe that you have been a victim of abuse and that there is a danger of serious and immediate injury to you, you may request the assistance of a police officer or local law enforcement agency.

The law enforcement officer must protect you from harm when responding to your request for assistance and may, if you ask, accompany you to the family home so that you may remove clothing and medicine, medical devices, and other personal effects required for you and your children, regardless of who paid for them.

You are entitled to request that address and telephone number of a victim, a complainant, or a witness be considered for shielding at the filing of this application.

NOTICE: Remote access to the name, address, telephone number, date of birth, e-mail address, and place of employment of a victim or non-party witness is blocked. (Md Rule 16-1008(a)(3)(B))



MARYLAND JUDICIARY ☒ CIRCUIT COURT ☐ DISTRICT COURT OF MARYLAND FOR Baltimore County  
 Located at 401 Bosley Avenue, Towson, MD 21204 Case No. \_\_\_\_\_  
 Court Address

CANDACE D. WILLIAMS vs. TERRELL SUGGS  
 Petitioner Respondent

### PROTECTIVE ORDER ADDENDUM

Failure to provide information on this Addendum may prevent law enforcement from processing the Court's Protective Order. This may endanger your safety or the safety of another protected party. Please provide as much information as possible.

### DESCRIPTION OF RESPONDENT (Alleged Abuser)

Full Name: Terrell Suggs		Date of Birth: 10/11/1982		Approximate Age: 30	
Race: Af-Am	Sex: Male	Height: 6'4"	Weight: 265	Hair Color: Brown	Eye Color: Brown
Skin Tone (Light/Medium/Dark): Medium					
Scars, Tattoos (where on body and description): Left arm Tribal Tattoo Right arm Jesus face					
Home Address: [REDACTED]					
City, State, Zip: Windsor Mill, MD 21244					
Telephone/Cel. Number: [REDACTED]					
Employer: Baltimore Ravens				Work Hours:	
Work Address: 1 Winning Drive					
City, State, Zip: Owings Mills, MD				Telephone Number:	
Vehicle Make: Rever	Model/Color: White	Year: 2008	Tag #:	State: AZ	Driver's License #:
Weapons:					
Other locations or information about Respondent: White 750 BMW; Black BMW-745, Black Hummer					

### PETITIONER (Person Requesting Assistance)

Full Name: Candace Danielle Williams		Date of Birth: 7/9/1983		Approximate Age: 29	
Race: Af-Am	Sex: Female	Height: 5'11"	Weight: 117		

### INFORMATION ABOUT OTHER PERSONS PETITIONER WANTS PROTECTED

Full Name: [REDACTED]	Race: Af-Am	Sex: Female	Date of Birth: [REDACTED]	Weight: 50	Age: 5
Full Name: [REDACTED]	Race: Af-Am	Sex: Male	Date of Birth: [REDACTED]	Weight: 20	Age: 3
Full Name:	Race:	Sex:	Date of Birth:	Weight:	Age:
Full Name:	Race:	Sex:	Date of Birth:	Weight:	Age:

Petitioner's Signature

Date 11-20-12

TERRELL SUGGS  
8400 Summitt Avenue  
Baltimore, Maryland 21244

Plaintiff

vs.

CANDACE WILLIAMS  
last known address  
8400 Summitt Avenue  
Baltimore, Maryland 21244

Defendant

IN THE  
CIRCUIT COURT  
FOR  
BALTIMORE COUNTY

RECEIVED AND FILED

NOV 19 PM 3:26

CLERK OF COURT  
BALTIMORE COUNTY

\*\*\*\*\*

**COMPLAINT FOR IMMEDIATE CUSTODY AND REQUEST  
FOR EMERGENCY HEARING**

Terrell Suggs, Plaintiff, by E. Lynn Hoffman, Warren S. Alperstein and Alperstein & Diener, P.A., his attorneys respectfully represents unto Your Honor:

1. Plaintiff, Terrell Suggs, is a resident of Baltimore County, Maryland, having resided there more than one (1) year prior to the filing of this Complaint.

2. Defendant, Candace Williams, is an adult citizen and has been a resident of the State of Maryland for more than one (1) year prior the filing of this Complaint.

3. Defendant Candace Williams resided with Plaintiff and their minor children, [REDACTED] and [REDACTED] December 4, 2008 until November 16, 2012 when she departed the Plaintiff's residence taking the minor children with her and refusing to inform Plaintiff of their intended destination, thereby denying him access to his children.

4. The parties are the natural parents of the minor children and were never married.

5. The parties and the children began residing together in the spring of 2008 at [REDACTED] Owings Mills, Maryland 21117 and then moved to [REDACTED] Baltimore County, Maryland 21244 where they lived continuously from March 2010 until November 16, 2012 when Defendant left the Plaintiff's home with the children.

REQUEST FOR  
EMERGENCY  
HEARING  
DENIED -  
NO EMERGENCY  
B. C. J.  
11-21-12

H. W.

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From December 4, 2009 until March, 2010, the minor children resided with the Defendant in Pikesville, Maryland at the Courts of Avalon, by virtue of the parties' Consent Protective Order entered in Baltimore City District Court on December 11, 2009. Defendant Candace Williams filed a Motion to Rescind the Protective Order and testified in open Court requesting rescission of the Order which was granted on January 21, 2010, case number: SP096572009. After rescinding the Order, Defendant and the minor children moved back to [REDACTED] with the Plaintiff and lived there continuously for more than two and a half years. On December 8, 2009 Defendant filed a Complaint for Custody in the Circuit Court for Baltimore County, case number: 03C09014767. Defendant filed a Voluntary Dismissal on February 3, 2010. On December 8, 2009, Defendant simultaneously filed a Complaint in the Circuit Court for Baltimore County case number: 03C09014768, alleging Assault and Battery against Plaintiff seeking Twenty Million Dollars in compensatory damages and Fifty Million Dollars in punitive damages. Defendant again filed a Voluntary Dismissal in that case on January 22, 2010 following which she resumed living with the Plaintiff and their children. Plaintiff has not participated, as a party or witness or in any other capacity, in any other proceeding concerning the custody of or visitation with the children; he has no information of any custody proceeding concerning the children pending in a court of this or any other State; and he does not know of any person who is a not a party to these proceedings who has physical custody of the children, although Plaintiff is unaware of the children's current whereabouts as a result of Defendant's clandestine move.

6. Plaintiff is gainfully employed by the Baltimore Ravens.

7. Defendant was previously employed as a stripper, but is currently unemployed and has never contributed to the financial support of the parties' minor children.

8. Prior to Defendant departing the home that the parties resided in with their minor children, Defendant had both [REDACTED] (5 years old) and [REDACTED] (almost 4 years old) at [REDACTED]

notwithstanding that she was unemployed.

9. Defendant is verbally abusive to the children, utilizes corporal punishment as a means of controlling the children, smokes marijuana while the children are in the home and is, therefore, not able to properly supervise or attend to the children. See Dmarr Suggs' Affidavit attached as Exhibit A.

10. Defendant's marijuana usage has escalated such that when Plaintiff returns from work, Defendant is asleep and the minor children are left to watch tv or movies and not properly supervised. Defendant's marijuana usage is having an adverse impact upon the children.

11. Defendant's marijuana use while the children are home, Defendant's inability to control her temper coupled with her lack of interaction with the children, are all indicators that it is not in their best interests to be in her care and custody.

12. Plaintiff is a fit and proper person to have sole legal and physical custody of the children and it is in their best interests to be in his care and custody.

13. Plaintiff assists [REDACTED] with her homework from [REDACTED], plays educational games with the children, basketball with [REDACTED], disciplines without corporal punishment and drives them to daycare when it does not conflict with his work schedule.

14. The minor children have a close and loving relationship with their father.

15. Plaintiff is concerned about the children's safety and welfare and Defendant's stability based on her past erratic behavior, drug usage and anger management problems all of which are contrary to the best interests of the children.

16. Plaintiff's mother, Laverne Kennedy-Suggs, Plaintiff's aunt Katrina Kennedy and Plaintiff's cousin Dmarr Suggs are very close to the minor children, live in Baltimore and spend considerable time with them and have a loving relationship with them.

17. Defendant's decision to take the children from their home just prior to Plaintiff's departure for an away Ravens' game and not inform him of their whereabouts is of grave concern and further evidence of Defendant's intention to deny Plaintiff access to his children.



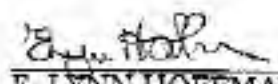
18. Plaintiff has provided emotional and financial stability for the children.
19. Defendant's volatile nature, uncontrollable temper and anger is contrary to the children's best interests.
20. Defendant is not close with her family members, the children are not involved with or close to the Defendant's family members, but are extremely close with Plaintiff's family.
21. Defendant's behavior, as previously averred, coupled with her taking the children without Plaintiff's consent and providing no current address or location for the minor children places their safety and welfare in jeopardy such that the Plaintiff seeks an emergency hearing.

**WHEREFORE**, the Plaintiff requests:

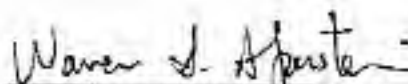
- A. That he be awarded immediate sole legal and physical custody of the children of the parties, pendente lite and permanently;
- B. That the Court set this matter in for an Emergency Hearing;
- C. That the Defendant be ordered to return the children to Baltimore immediately if she has removed them from Maryland;
- D. That he be awarded such other and further relief as the nature of his cause may require.



TERRELL SUGGS



E. LYNN HOFFMAN  
Alperstein & Diener, P.A.  
201 N. Charles Street, Suite 2000  
Baltimore, Maryland 21201  
(410) 685-9900

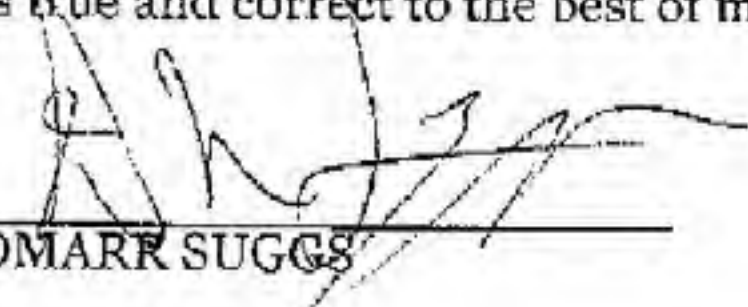


WARREN S. ALPERSTEIN  
Alperstein & Diener, P.A.  
201 N. Charles Street, Suite 2000  
Baltimore, Maryland 21201  
(410) 685-0990

AFFIDAVIT

1. I, Dmarr Suggs, am 34 years of age.
2. I am Terrell Suggs' cousin and currently work as his assistant.
3. I have an AA degree in Social Behavioral Science, a BS degree in Physical Education and one semester towards a Master's Degree in Athletic Administration.
4. I was an assistant basketball coach for four years at Northeastern Junior College in Colorado.
5. I began working for Terrell Suggs in February, 2011.
6. I reside in Baltimore at [REDACTED] Randallstown, Maryland 21133.
7. I am at Terrell Suggs' home at [REDACTED], Baltimore, Maryland 21244 at least 3-4 times a week for extended periods as part of my job responsibilities.
8. I have knowledge that Candace Williams smokes marijuana while the children are home.
9. She spends considerable time sleeping during the day not supervising the children.
10. Candace Williams is verbally abusive to the children, cursing at them and unable to control her temper.
11. I have observed her spanking the children as a means of controlling them.
12. Candace Williams is confrontational and her interactions with the children are contrary to their welfare.

I SOLEMNLY DECLARE AND AFFIRM under the penalties of perjury that the above is true and correct to the best of my knowledge, information and belief.

  
DMARR SUGGS

11-19-12  
DATE



**AFFIDAVIT**

I do solemnly declare and affirm under the penalties of perjury that the matters and facts set forth in the Complaint are true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
TERRELL SUGGS